

REMARKS/ARGUMENTS

In response to the Office Action dated July 13, 2007, Applicants respectfully request reconsideration.

The Examiner noted in the Office Action several times that recitations of an element "configured to" or "configured such that" were not deemed to be a positive recitation. While Applicants believe the claims previously positively recited features, the independent claims have been amended regarding the identified language to provide positive recitations as suggested by the Examiner.

Claim Rejections Under 35 U.S.C. §102

Claims 1, 4, 5 and 8-10

Claims 1, 4, 5 and 8-10 stand rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Pat. No. 7,042,737 (Woolsey).

Applicants respectfully assert that independent claim 1 and its dependent claims are patentable over Woolsey. Woolsey does not teach, disclose, or suggest at least the surge protection circuitry recited in claim 1. At col. 5, ll. 8-22 cited by the Examiner, Woolsey discusses that a common ground provides a "low impedance tunnel for channeling high frequency signals to ground." According to this portion of Woolsey, "the energy generated by high frequency interconnect technologies . . . is contained until it reaches the external port 116." (emphasis added). Conversely, claim 1 recites an in-line surge protection system that includes surge-protection modules that include surge protection circuitry that inhibits an electrical surge received at a first receptacle from reaching a second receptacle. While Woolsey discusses containing energy until it reaches an external port, claim 1 recites circuitry that inhibits energy from reaching a receptacle. Thus, for at least these reasons, independent claim 1 and claims 4 and 5, that depend from claim 1, are patentable over Woolsey.

Applicants respectfully assert that independent claim 8 and its dependent claims are patentable over Woolsey. Woolsey does not teach, disclose, or suggest at least the electrically-conductive bias members recited in claim 8. The Examiner cited element 132 and

FIGS. 1-12 of Woolsey as teaching electrically-conductive bias members. As shown in FIGS. 7-8,

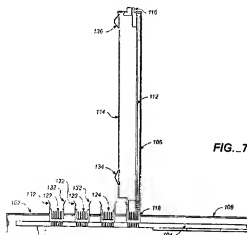


FIG. 7

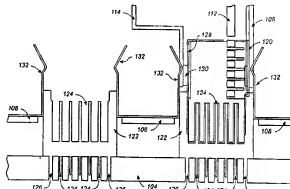


FIG. 8

the elements 132 can receive modules 106, being in contact with an interface module container 114 that contains a circuit board 112 (col. 3, ll. 25-27). The elements do not contact and are not biased against the circuit board 112. Claim 8, however, recites electrically-conductive bias members that contact and are biased against portions of respective circuit boards of module received by a chassis. Thus, for at least these reasons, independent claim 8 and claims 9-10, that depend from claim 8, are patentable over Woolsey.

Claims 14-24

Claims 14-24 stand rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Pat. No. 6,552,915 (Takahashi).

Applicants respectfully assert that independent claim 14 and its dependent claims are patentable over Takahashi. Takahashi discusses a printed circuit board 43 but does not teach, disclose, or suggest that the circuit board includes surge protection circuitry. The Examiner asserted that the prior claim language of "configured to" only required the ability to perform a function and asserted that Takahashi had such ability. Takahashi does not teach, disclose, or

suggest "a circuit board including surge-protection circuitry between an input and an output, where the surge-protection circuitry disconnects the input from the output in response to a power surge" as recited in claim 14. Thus, for at least these reasons, independent claim 14 and claims 15-19, that depend from claim 14, are patentable over Takahashi.

Applicants respectfully assert that independent claim 20 and its dependent claims are patentable over Takahashi. Takahashi discusses a printed circuit board 20 but does not teach, disclose, or suggest removable modules that provide "a surge-protected electrical connection between [a] plurality of connectors connected to each module that disconnects the surge-protected electrical connection in response to an electrical surge" as recited in claim 20. Thus, for at least these reasons, independent claim 20 and claims 21-24, that depend from claim 20, are patentable over Takahashi.

Claim Rejections Under 35 U.S.C. §103

Claims 2, 3, 6, 7 and 11-13 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Pat. No. 7,042,737 (Woolsey) in view of U.S. Pat. No. 6,552,915 (Takahashi). These claims depend from either independent claim 1 or independent claim 8 and are therefore patentable for at least the respective reasons presented above with respect to these independent claims.

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Appl. No. 10/766,055
Amdt. dated October 15, 2007
Amendment under 37 CFR 1.116 Expedited Procedure
Examining Group 2841


PATENT

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance and an action to that end is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 858-350-6100.

Respectfully submitted,


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